

David W. Wessel, Esq. Bar # 115222  
service@efronlawfirm.com  
**LAW OFFICES OF BORIS E. EFRON**  
130 Portola Road  
Portola Valley, CA 94028-7825  
Telephone: (650) 851-8880  
Facsimile: (650) 851-3001

Attorneys for Creditors  
MARINA GELMAN and MIKHAIL GELMAN

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re: Case No. 19-30088 (DM)

## PG&E CORPORATION,

Chapter 11

-and-

Chapter 11

## PACIFIC GAS AND ELECTRIC COMPANY.

(Lead Case - Jointly Administered)

**NOTICE OF HEARING ON MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY  
AND ABSTENTION PURSUANT TO 28  
U.S.C. 1334(c)(1); OBJECTION TO THE  
BANKRUPTCY COURT ADJUDICATING  
MOVANTS' PERSONAL INJURY  
CLAIMS**

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

\* All papers shall be filed in the Lead Case, No. 19-3008 (DM).

Date: April 24, 2019

Time: 9:30 a.m.

Ctrm: Hon. Dennis Montali  
450 Golden Gate Avenue  
16<sup>th</sup> Floor, Courtroom 17  
San Francisco, CA 94102

## TO THE DEBTORS AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that on April 24, 2019, at 9:30 a.m., before the Honorable Dennis Montali, United States Bankruptcy Judge, in Courtroom 17 of the United States Bankruptcy Court,

1       450 Golden Gate Avenue, 16<sup>th</sup> Floor, San Francisco, California, Marina Gelman and Mikhail  
2       Gelman, through their undersigned attorney, will move the Court for its Order:

3           1.       Terminating, annulling, modifying, or conditioning the automatic stay of 11 U.S.C.  
4       §362(a) to allow the Gelmans to prosecute to judgment their lawsuit for personal injury against the  
5       Pacific Gas and Electric Company (“PG&E”), the City and County of San Francisco (“San  
6       Francisco”), and Blue Plantain, LLC, pending in the San Francisco County Superior Court, Case  
7       No. CGC-17-556763 (“the Lawsuit”);

8           2.       Abstaining pursuant to 28 U.S.C. § 1334(c)(1);

9           3.       Providing that the 14-day stay prescribed by Federal Bankruptcy Rule 4001(a)(3)  
10      shall not apply to the Court’s order issued pursuant to this motion; and

11          4.       For such other and further relief as this Court deems just and proper pursuant to this  
12      motion.

13           Creditors object to the Bankruptcy Court being the forum for the trial of their personal injury  
14      claims pursuant to 28 U.S.C. §157.

15           This motion is brought pursuant to 11 U.S.C. §362(d)(1) for cause. This motion is  
16      based upon this Notice, the Points and Authorities, the Request for Judicial Notice, and the  
17      Declaration of David W. Wessel filed in support of this motion concurrently with this notice, upon  
18      all other pleadings and papers on file herein, and upon such oral and documentary evidence as may  
19      be presented by the Gelmans at the hearing on this motion.

20           Pursuant to Local Rule 4001-1(a) respondent(s) opposing the motion shall appear personally  
21      or by counsel at the preliminary hearing. Respondent(s) will not be required to, but may, file  
22      responsive pleadings, points and authorities, and declarations for any preliminary hearing.

23           IN THE EVENT THAT NEITHER THE DEBTOR NOR ITS COUNSEL, NOR ANY  
24      OTHER INTERESTED PARTY APPEARS AT THE HEARING ON THIS MOTION, THE  
25      COURT MAY GRANT RELIEF FROM THE AUTOMATIC STAY PERMITTING CREDITORS  
26      TO CONTINUE PROSECUTING THE LAWSUIT WITHOUT FURTHER HEARING.

27          ///

28          ///

1 Attached as Exhibit 1 to this Notice is the Gelmans' proposed form of the Order.  
2

3 Dated: April 3, 2019

LAW OFFICES OF BORIS E. EFRON

5 /s/ David W. Wessel  
6 (SBN: 115222)

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Law Offices  
of  
Boris E. Efron  
130 Portola Road  
Portola Valley, CA 94028  
(650) 851-8880

Case: 19-30088 Doc# 1202 Filed: 04/03/19 Entered: 04/03/19 13:08:26 Page 3 of 6  
NOTICE OF HEARING ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11                   **EXHIBIT 1**  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Law Offices  
of  
Boris E. Efron  
130 Portola Road  
Portola Valley, CA 94028  
(650) 851-8840

1 David W. Wessel, Esq. Bar # 115222  
2 service@efronlawfirm.com  
3 LAW OFFICES OF BORIS E. EFRON  
4 130 Portola Road  
5 Portola Valley, CA 94028-7825  
6 Telephone: (650) 851-8880  
7 Facsimile: (650) 851-3001

8  
9 Attorneys for Creditors  
10 MARINA GELMAN and MIKHAIL GELMAN

11  
12  
13 UNITED STATES BANKRUPTCY COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA  
16  
17 SAN FRANCISCO DIVISION

18 In re:

Case No. 19-30088 (DM)

19 PG&E CORPORATION,

Chapter 11

20 -and-

(Lead Case - Jointly Administered)

21 PACIFIC GAS AND ELECTRIC COMPANY,

**ORDER FOR RELIEF FROM THE  
AUTOMATIC STAY AND ABSTENTION  
PURSUANT TO 28 U.S.C. 1334(c)(1)**

22 Debtors.

---

23  
24  
25  
26  
27  
28

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-3008 (DM).

Date: April 24, 2019

Time: 9:30 a.m.

Ctrm: Hon. Dennis Montali  
450 Golden Gate Avenue  
16<sup>th</sup> Floor, Courtroom 17  
San Francisco, CA 94102

The motion of Marina Gelman and Mikhail Gelman ("the Gelmans") for relief from the automatic stay and abstention (the "Motion") came on for hearing before the Hon. Dennis Montali, United States Bankruptcy Court Judge, on April 24, 2019. The Court having considered all papers filed in support of the Motion and the \_\_\_\_\_ opposition, and upon due consideration, and good cause appearing,

**IT IS ORDERED** that the automatic stay is terminated as to the Gelmans who may take any acts, or institute and/or complete any proceedings necessary to prosecute to judgment their lawsuit for personal injury against Pacific Gas and Electric Company pending in the San Francisco County Superior Court, Case No. CGC-17-556763 (“the Lawsuit”). The Court will abstain pursuant to 28 U.S.C. § 1334(c)(1) from hearing the Lawsuit.

**IT IS FURTHER ORDERED** that the 14-day stay provided by Federal Bankruptcy Rule of Procedure 4001(a) (3) shall not apply to this Order.

\*\*END OF ORDER\*\*